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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)
)
Local Exchange Carriers' Rates,) CC Docket No. 93-162
Terms, and Conditions for)
Expanded Interconnection for)
Special Access)

MOTION FOR EXTENSION OF TIME

Southwestern Bell Telephone Company (SWBT), pursuant to Section 1.46 of the Rules of the Federal Communications Commission,¹ (Commission), hereby requests an Extension of Time until September 10, 1993, to file its Direct Case in this docket. The additional time is needed for SWBT to gather and provide the Commission with the information that SWBT is required to submit.

The Common Carrier Bureau (Bureau) suspended the Special Access Expanded Interconnection tariffs of SWBT and other Tier 1 Local Exchange Carriers (LECs) and initiated an investigation on June 9, 1993.² Over six weeks later, the Bureau issued the Order designating the issues for investigation.³ The Designation Order only gave SWBT three weeks, however, to submit its Direct Case.

By giving SWBT less than half the time to answer the questions than the Bureau took to designate the questions in the first place, the Designation Order will not allow SWBT the time it

¹ 47 C.F.R. Section 1.46.

² Ameritech Operating Companies, Transmittal Nos. 697, et al., 8 FCC Rcd. 4589 (Com. Car. Bur. 1993) (Special Access Tariff Order).

³ Local Exchange Carriers' Rates, Terms and Conditions for Expanded Interconnection for Special Access, CC Docket 93-162, Order designating issues for investigation, (DA 93-951) (released July 23, 1993) (Designation Order).

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deserves to present its Direct Case effectively. Further, the schedule unreasonably allows more time for the filing of oppositions than it does for the submissions of the Direct Cases.

The cost studies which support the rates for collocation and interconnection required in excess of sixty days to complete. The information requested in the TRP requires a new format which is not readily available. To meet the requirements of the TRP, substantial reformatting and rework of the supporting data is required.

In addition, as noted by the motions of other LECs for similar extensions, other Direct Case proceedings (the 1993 Annual Access Tariff investigation⁴ and the 800 Data Base Tariff investigation)⁵ are ongoing at the same time, as is preparation for the tariff filing in response to the Transport Order on Reconsideration,⁶ and the generation of the report currently requested in CC Docket No. 85-166.⁷

A number of the same personnel will be working on these proceedings. The difficulty of this situation is compounded by two

⁴ 1993 Annual Access Tariff Filings, CC Docket No. 93-193, Memorandum Opinion and Order Suspending Rates and Designating Issues for Investigation (DA 93-762) (released June 23, 1993).

⁵ 800 Data Base Access Tariffs and the 800 Service Management System Tariff, CC Docket No. 93-129, Order Designating Issues for Investigation (DA 93-930) (released July 19, 1993).

⁶ Transport Rate Structure and Pricing, CC Docket No. 91-213, First Memorandum Opinion and Order on Reconsideration (FCC 93-366) (released July 21, 1993) (Transport Order on Reconsideration).

⁷ Investigation of Special Access Tariffs of Local Exchange Carriers, CC Docket No. 85-166, Phase II, Part 1 and Phase III, Part 1, Memorandum Opinion and Order (FCC 93-337) (released July 12, 1993).

additional factors. First, many personnel have already scheduled vacations during the month of August, and second, some employees are having difficulty in commuting to their work locations, given the current flooding conditions in the metropolitan St. Louis area, making overtime work more problematic.

For the foregoing reasons, SWBT respectfully requests implementation of the following schedule for submitting its Direct Case and responding to Oppositions thereto:

SWBT's Direct Case due: September 10, 1993

Oppositions or Comments due: October 1, 1993


Rebuttals due: October 22, 1993

Under the above schedule, the Commission would then still have approximately three weeks with which to analyze the Direct Cases, Oppositions, and Rebuttals, and to rule on the issues before the scheduled end of the suspension period, currently November 16, 1993.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

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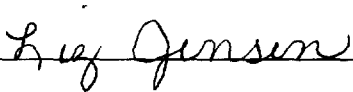
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August 5, 1993

CERTIFICATE OF SERVICE

I, Liz Jensen, hereby certify that the foregoing Motion for Extension of Time of Southwestern Bell Telephone Company in Docket No. 93-162, has been served this 5th day of August, 1993 to the Parties of Record.


Liz Jensen

August 5, 1993

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